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9 the individual defendants

10  
11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN JOSE DIVISION**

14 ARIEL ABITTAN

15 PLAINTIFF,

16 v.

17 LILY CHAO ET AL.,

18 DEFENDANTS,

19 and

20 EIAN LABS INC.,

21 NOMINAL DEFENDANT.  
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Case No.: 5:20-CV-09340-NC

**DECLARATION OF CRAIG A. HANSEN  
IN SUPPORT OF STIPULATION AND  
JOINT REQUEST TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
RELATED DEADLINES**

Judge: Hon. Nathanael M. Cousins

1 I, Craig A. Hansen, hereby declare:

2 1. I am an attorney admitted to practice before this Court and an attorney at the law firm  
3 of Hansen Law Firm, P.C., which represents Temujin Labs Inc. (Cayman) (“Temujin Cayman”) and  
4 the individual defendants. I have personal knowledge of the matters set forth in this declaration and,  
5 if called upon to do so, could and would testify competently as to the matters described below.

6 2. My firm, the Hansen Law Firm, P.C., counsel for Defendants was recently retained to  
7 substitute for Defendants’ prior counsel, Culhane Meadows PLLC for the instant civil action, and  
8 submitted the Notice of Change of Counsel on October 15, 2021 (Dkt. 98). Counsel for the  
9 Defendants is in the process of getting up to speed as quickly as possible on this matter.

10 3. Pursuant to this Court’s Order Setting Initial Case Management Conference and ADR  
11 Deadlines (“Scheduling Order”) (Dkt. 3), the parties must meet and confer regarding initial  
12 disclosures, early settlement, ADR process selection, and discovery plan no later than 21 days before  
13 the Case Management Conference. The parties must file a Case Management Statement pursuant to  
14 the Standing Order for All Judges of the Northern District of California regarding the Contents of  
15 Joint Case Management Statement no later than 7 days before the Case Management Conference.

16 4. Defendants’ undersigned counsel understands that the Rule 26(f) conference has not  
17 yet occurred and is already out of time. Defendants need to prepare positions and the parties’ counsel  
18 need to meet in order to satisfy Rule 26(f) sufficiently before deadlines relating to the Case  
19 Management Statement and the Case Management Conference.

20 5. In light of the foregoing, Defendants request a short continuance to conduct a meet  
21 and confer among current counsel for the undersigned regarding initial disclosures and a discovery  
22 plan.

23 6. The undersigned counsel for Defendants has sought and received Plaintiff’s consent  
24 to a relatively short continuance of the Case Management Conference, namely, from the current date  
25 of November 17, 2021 to December 8, 2021. Under this proposal—which mirrors the Scheduling  
26 Order—the parties must meet and confer regarding initial disclosures and a discovery plan by  
27 November 17, 2021. The last day to file a Rule 26(f) Report, complete initial disclosures or state  
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1 objections in a Rule 26(f) Report, and the last day to file a Case Management Statement shall be  
2 December 1, 2021.

3 7. On March 5, 2021, Dkt. 22, the Court continued the Initial Case Management  
4 Conference set for March 17, 2021 to April 28, 2021.

5 8. On April 21, 2021, Dkt. 44, the Court entered a Modified Order re 43 Stipulation  
6 Setting Schedule and Extending Time to Respond. The Court continued the Case Management  
7 Conference set for April 28, 2021 to July 7, 2021.

8 9. On June 28, 2021, Dkt. 67, the Clerk issued a Notice continuing the Case  
9 Management Conference set for July 7, 2021 to July 28, 2021.

10 10. On July 19, 2021, Dkt. 79, the Clerk issued a Notice continuing the Case  
11 Management Conference set for July 28, 2021 to October 6, 2021.

12 11. On September 29, 2021, Dkt 90, the Court granted the parties' Stipulation and Joint  
13 Request to Continue the Case Management Conference set for October 6, 2021 to November 17,  
14 2021.

15 12. The undersigned counsel for Defendants understands that no discovery has been  
16 served in this action, and therefore no discovery deadlines would be affected.

17 13. As there has not yet been a Case Management Conference, the undersigned counsel  
18 understands no other deadlines in this civil action have been established.

19 14. I submit this declaration in support of the accompanying Stipulation and Joint  
20 Request to Continue Case Management Conference and Related Deadlines without prejudice to  
21 Temujin Cayman's and the individual defendants' rights as to, and intending to waive no arguments  
22 with respect to, service and jurisdiction.

23 I declare under penalty of perjury under the laws of the United States of America that the  
24 foregoing is true and correct.

25 Executed this 10th day of November, 2021, at San Jose, California.

26  
27 By: /s/ Craig A. Hansen  
Craig A. Hansen  
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